

To: The Federal Commissions Commission
Washington, DC 20554

From: David M. Drumheller
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This correspondence contains comments on Petition No. RM-10782, "Petition to remove Morse Code Requirements from all Amateur Service License Classes," submitted by P.V. Coppola et al and received by the Commission on July 18, 2003.

The petitioners argue that the "CW requirement" (demonstrated ability to communicate with Morse code for obtaining an amateur radio license permitting the use of high-frequency amateur bands) should be removed because, for various technical and political reasons, Morse code is no longer a primary mode of radio communication. They further argue that the removal of the requirement will result in an increase in the number of radio amateurs, but without any significant increase in the burden of enforcement.

I generally agree with these arguments and support the petitioner's principal recommendation to remove the CW requirement for obtaining an amateur radio license.

There are recommendations in the petition that I do not entirely agree with. One is the removal of the CW requirement without any other changes made to the exam structure. If the requirement is removed, there would be some value in including additional questions on the written exams for all amateur radio licenses because it would maintain, in some sense, the level of effort required to earn them. Admittedly, this point is arguable, but it should be considered in any rulemaking change resulting from this or any similar petition.

Another recommendation that I do not agree with is the immediate removal of the CW requirement on a provisional basis. Understandably, the petitioners are anxious to see changes made, but bureaucracy has its place. Rather, I encourage the Commission to move quickly on this matter and issue a Notice of Proposed Rulemaking as soon as possible. The required changes to Part 97 will not be extensive; the entire process for formally eliminating the CW requirement could be completed well within one year.

The recommendations to upgrade Technician Class license privileges to those of the Technician-Plus Class license and to keep the current band plans are reasonable.

I close with these personal observations: I am an amateur radio operator (K3WQ) who enjoys using Morse code because it is challenging; nevertheless, I view the skill of communicating with it an arcane one. Given that institutions in the commercial and military radio services--services far more important to the economy and national security than the amateur radio service--have abandoned Morse code, there is little justification to continue imposing the CW requirement on amateur radio operators.

David M. Drumheller